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DISTRICT OF UTAH

BY: _____
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GARY L. JOHNSON [4353]
RAMONA E. GARCIA [8923]
RICHARDS, BRANDT, MILLER & NELSON
Key Bank Tower, Seventh Floor
50 South Main Street
P.O. Box 2465
Salt Lake City, Utah 84110-2465
Telephone: (801) 531-2000
Fax No.: (801) 532-5506

*Attorneys for Defendants American International Group, Inc.,
American International Specialty Lines Insurance Company,
American International Surplus Lines Agency, Inc.,
and AIG Technical Services, Inc.*

MICHAEL SKOLNICK [4671]
KIPP AND CHRISTIAN
10 Exchange Place, Suite 400
Salt Lake City, Utah 84111
Telephone: (801) 521-3773
Fax No.: (801) 359-9004

Attorneys for Defendant AG States Agency, L.L.C.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, NORTHERN DIVISION

TRENTON FEED COOPERATIVE, a Utah
corporation; PLANTERS COTTON OIL
MILL, INC., an Arkansas corporation,

Plaintiffs,

vs.

AMERICAN INTERNATIONAL GROUP,
INC., a Delaware corporation; AMERICAN
INTERNATIONAL SPECIALTY LINES
INSURANCE COMPANY, an Alaska

**JOINT NOTICE OF REMOVAL TO
UNITED STATES DISTRICT COURT**

Judge Ted Stewart
DECK TYPE: Civil
DATE STAMP: 11/12/2003 @ 16:41:58
CASE NUMBER: 1:03CV00131 TS

corporation; AMERICAN INTERNATIONAL SURPLUS LINES AGENCY, INC., a New Jersey corporation; AIG TECHNICAL SERVICES, INC., a Delaware corporation; and AG STATES AGENCY, L.L.C., a Minnesota limited liability company,

Defendants.

TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH, NORTHERN DIVISION:

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332, the defendants American International Group, Inc., American International Specialty Lines Insurance Company, American International Surplus Lines Agency, Inc., and AIG Technical Services, Inc., by and through their counsel of record, Gary L. Johnson and Ramona E. Garcia of RICHARDS, BRANDT, MILLER & NELSON, and AG States Agency, L.L.C., by and through its counsel of record, Michael Skolnick of KIPP AND CHRISTIAN, (hereinafter “removing defendants”) have removed the civil action pending against them in the First Judicial District Court, in and for Cache County, State of Utah, to this Honorable Court. The removing defendants allege the following grounds for removal:

1. On or about October 9, 2003 plaintiffs filed a Complaint in the First Judicial District Court, in and for Cache County, State of Utah, civil number 030101898 CN (hereinafter the “state court action”). Service was effected on two of the AIG related defendants

on October 13, 2003 (American International Surplus Lines Agency, Inc. and AIG Technical Services, Inc.). Service was effected on the remainder of the defendants after October 13, 2003.

2. Plaintiff Trenton Feed Cooperative is a Utah corporation with its principal place of business in the State of Utah.

3. Plaintiff Planters Cotton Oil Mill, Inc., is an Arkansas corporation with its principal place of business in the State of Arkansas.

4. Defendant American International Group, Inc. is a Delaware corporation with its principal place of business in the State of New York.

5. Defendant American International Specialty Lines Insurance Company is an Alaska corporation with its principal place of business in State of New York.

6. Defendant American International Surplus Lines Agency, Inc., is a New Jersey corporation with its principal place of business in the State of New Jersey.

7. Defendant AIG Technical Services, Inc., is a Delaware corporation with its principal place of business in the State of New York.

8. Defendant AG States Agency, L.L.C., is a Minnesota limited liability company with its principal place of business in St. Paul, Minnesota.

9. This Court has jurisdiction of the above-entitled action pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between plaintiffs and all defendants, and hence this action may be removed to this Court pursuant to 28 U.S.C. § 1441.

Plaintiffs' claims against the removing defendants exceeds \$75,000.00 exclusive of interest and costs.

10. A copy of the Complaint in the state court action is attached as **Exhibit 1**, and a copy of the Notice of Filing of Notice of Removal to United States District Court is attached as **Exhibit 2**.

11. The District Court for the First Judicial District, Cache County, State of Utah, is located within this Court's jurisdiction.

12. The earliest service on at least one of the removing defendants was October 13, 2003 and, therefore, removal is timely under 28 U.S.C. § 1446. All defendants join in this Notice of Removal.

13. Removing defendants have filed a copy of this Joint Notice of Removal to United States District Court with the Clerk of the First Judicial District Court, Cache County, State of Utah.

14. Defendant AG States Agency, L.L.C. by and through its counsel of record, Michael Skolnick of KIPP AND CHRISTIAN, joins in this Notice of Removal.

WHEREFORE, removing defendant notify this Court, plaintiffs, and the District Court for the First Judicial District, Cache County, State of Utah, that this action has been removed to the United States District Court for the District of Utah, Northern Division.

DATED this 12 day of November, 2003.

RICHARDS, BRANDT, MILLER
& NELSON



GARY L. JOHNSON
RAMONA E. GARCIA

Attorneys for Defendants American International Group, Inc., American International Specialty Lines Insurance Company, American International Surplus Lines Agency, Inc., and AIG Technical Services, Inc.

KIPP AND CHRISTIAN



MICHAEL SKOLNICK

Attorneys for Defendant AG States Agency, L.L.C.

CERTIFICATE OF SERVICE

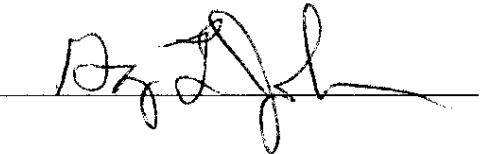
I HEREBY CERTIFY that a true and correct copy of the foregoing instrument was mailed, first-class, postage prepaid, on this 12 day of November, 2003, to the following:

Douglas J. Parry
Jennie B. Garner
PARRY ANDERSON & GARDINER
60 East South Temple, Suite 1270
Salt Lake City, Utah 84111

Attorneys for Plaintiffs

Michael Skolnick
KIPP AND CHRISTIAN
10 Exchange Place, Suite 400
Salt Lake City, Utah 84111

Attorneys for Defendant AG States Agency, L.L.C.



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Exhibits/
Attachments
to this document
have **not** been
scanned.

Please see the
case file.